## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO CLEVELAND DIVISION

JASMINE LAWRENCE, individually and	)	CASE NO.: <u>1:12-cv-2600</u>
on behalf of all similarly situated	)	
individuals,	)	
	)	HONORABLE CHRISTOPHER A. BOYKO
Plaintiff,	)	
	)	MOTION FOR ADMISSION PRO HAC
VS.	)	VICE OF ATTORNEY C. RYAN
	)	MORGAN AND MORGAN & MORGAN,
MAXIM HEALTHCARE SERVICES,	)	P.A.
INC., a Maryland Corporation,	)	
	)	
Defendant.	)	

Plaintiff, JASMINE LAWRENCE, individually and on behalf of all similarly situated individuals, and the putative class, respectfully move this Court to admit C. Ryan Morgan, Esq., and the law firm of Morgan & Morgan, P.A., *pro hac vice*, so that they may serve as co-counsel for Plaintiff in this matter. In accordance with Local Rule 83.5(h), Plaintiff state as follows:

1. Mr. Morgan has been, and presently is a member in good standing of the Florida Bar, and more particularly, the United States District Court for the Middle District of Florida. Mr. Morgan is also admitted and eligible to practice before the following courts:

Name of State or Federal	Bar	Date	Status	Address
Bar or Court	Number	Admitted		
Florida Bar	0015527	9/9/05	Active / Good	651 E. Jefferson Street
			Standing	Tallahassee, FL 32399-
				2300
U.S.D.C., Middle District	0015527	2/2006	Active / Good	401 West Central
of Florida			Standing	Boulevard Suite 1200
				Orlando, FL 32801
U.S.D.C., Northern District	0015527	5/2010	Active / Good	111 N. Adams St.
of Florida			Standing	Tallahassee, FL 32301
U.S.D.C., Southern District	0015527	7/28/2010	Active / Good	400 North Miami
of Florida			Standing	Avenue Miami, FL
			_	33128
U.S. Court of Appeals for	0015527	2008	Active / Good	56 Forsyth St. N.W.

the Eleventh Circuit			Standing	Atlanta, Georgia 30303
U.S.D.C., District of	0015527	2/2011	Active /	901 19th Street
Colorado			Good Standing	Denver, Colorado
				80294
U.S Court of Federal	0015527	3/12/09	Active / Good	717 Madison Place, NW
Claims			Standing	Washington, DC 2005-
				1011

2. Mr. Morgan's address, telephone number, facsimile number, and e-mail address are as follows:

Morgan & Morgan, P.A. 20 North Orange Avenue, Suite 1400 Orlando, FL 32802

Telephone: (407) 420-1414 Facsimile: (407) 245-3401

Email: RMorgan@forthepeople.com

- 3. Mr. Morgan's registration number in the State of Florida is 0015527.
- 4. The affidavit of Mr. Morgan in support of this Motion is attached as **Exhibit "A".**

Therefore, Plaintiffs respectfully request that this Court permit C. Ryan Morgan, Esq., of the law firm Morgan & Morgan, P.A., to appear on their behalf in this proceeding.

Respectfully submitted,

/s/ Robert E. DeRose

Robert E. DeRose, Esq. (0055214) Barkan Meizlish Handelman Goodin DeRose Wentz, LLP 250 E Broad St, 10<sup>th</sup> Floor Columbus, Ohio 43215 Telephone: (614) 221-4221

Fax: (614) 744-2300

Email: bderose@barkanmeizlish.com

Attorneys for Plaintiff

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was filed electronically on March 12, 2013 using the CM/ECF filing system which I understand will send a notice of electronic filing to all parties of record through the Court's system.

Respectfully submitted,

/s/ Robert E. DeRose

Robert E. DeRose, II, Esquire